

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BETHAN FAULKNER,

Plaintiff,

v.

LUCILE PACKARD SALTER
CHILDREN'S HOSPITAL,

Defendant.

Case No. [21-cv-00780-SI](#)

VERDICT FORM

We answer the questions submitted to us as follows:

1. Did Beth Faulkner prove by a preponderance of the evidence that her presentation of a complaint or report about unsafe patient care, services, or conditions at LPCH, to LPCH or its medical staff, was a substantial motivating reason for her discharge?

_____ **Yes** _____ **No**

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did LPCH prove by a preponderance of the evidence that Beth Faulkner's inadequate job performance was also a substantial motivating reason for LPCH's discharge?

_____ **Yes** _____ **No**

If your answer to question 2 is yes, then answer question 3. If you answered no, skip question 3 and answer question 4.

3. Would LPCH have discharged Beth Faulkner anyway at that time based on inadequate job performance had LPCH not also been substantially motivated by retaliation?

_____ **Yes** _____ **No**

If your answer to question 3 is no, then answer question 4. If you answered yes, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Did Beth Faulkner prove by a preponderance of the evidence that the discharge caused her harm?

_____ **Yes** _____ **No**

If your answer to question 4 is yes, then answer questions 5 and 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. What are Beth Faulkner's damages?

a. noneconomic loss, including mental suffering, emotional distress:

\$ _____

b. economic loss

\$ _____

TOTAL \$ _____

6. Did Beth Faulkner prove by clear and convincing evidence that, in terminating Beth Faulkner, conduct constituting malice, oppression, or fraud was committed by one or more officers, directors, or managing agents of LPCH?

_____ **Yes** _____ **No**

Please have the presiding juror sign and date this form.

Signed: _____
Presiding Juror

Dated: _____

After this verdict form been signed, notify the clerk that you are ready to present your verdict in the courtroom.

PUNITIVE DAMAGE VERDICT

We answer the questions submitted to us as follows:

1. What amount of punitive damages, if any, do you award Beth Faulkner?

TOTAL \$_____

Please have the presiding juror sign and date this form.

Signed: _____
Presiding Juror

Dated:_____

After this verdict form been signed, notify the clerk that you are ready to present your verdict in the courtroom.